

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION**

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MELVIN INGRAM;  
SHANTEL ADAMS;  
DAVID BECK;  
DWYANE BOWENS;  
ALFREDO CARDENAS;  
VERONICA CLEAVES;  
MARCUS COCHRAN;  
ROBERT COLUCCI;  
LESLIE CREWS;  
ERIC FLAKE

JACOB GREENWELL;  
LAWONDA HODGES;  
LAROME HUMPHREY;  
ROBERT KATALTEPE;  
JOHN LINTNER;  
KEESHA MCCLINTON;  
LAKISHA MCCOY;  
CLIFTON MCCOY;  
DEDRECK MCVAY;  
HARRY OLIVER;

DARRELL ONSBY;  
FREDERICK RAYFORD;  
JOHN RILES;  
ASHLEY ROBERTSON;  
DEANDRE ROSSER;  
DUSTIN RUSSELL;  
PATRICK SHAW;  
CEDRIC TAYLOR  
JESSE TOWNSEND; and  
STEVEN WESBY;

Individually and as potential class  
Representatives for all similarly  
Situated claimants

**PLAINTIFFS**

)

**VS.**

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**NO:2:17-cv-02795**

)

BILL OLDHAM, in his individual capacity  
and in his official capacity as the Sheriff of  
**CIVIL**

)

**CLASS ACTION COMPLAINT  
FOR VIOLATIONS OF THE**

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Shelby County, Tennessee; ROBERT  
MOORE, in his individual capacity and in  
his official capacity as the Jail Director of  
the Shelby County, Tennessee; CHARLENE  
McGHEE, in her individual capacity and in  
her official capacity as the of Assistant Chief  
Jail Security of Shelby County, Tennessee;  
DEBRA HAMMONS, in her individual  
capacity and in her official capacity as the  
Assistant Chief of Jail Programs of Shelby  
County, Tennessee; SHELBY COUNTY,  
TENNESSEE, a Tennessee municipality;  
and TYLER TECHNOLOGIES, INC., a  
foreign corporation, and other unknown  
and unnamed Individuals and Entities,

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**RIGHTS ACT OF 1871, 42 U.S.C.  
§1983 & TENNESSEE COMMON  
LAW**

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**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV.  
P. 38(a) & (b)**

**DEFENDANTS**

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NOTICE OF APPEARANCE

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Comes Now, Daniel Lofton and gives notice of appearance as counsel for Plaintiffs in this cause.

Respectfully submitted,

\_\_\_\_/s/ Daniel Lofton\_\_\_\_  
Daniel Lofton, #27386  
2400 Poplar Ave., Ste. 210  
Memphis, TN 38112  
901-849-5256

CERTIFICATE OF SERVICE

I, Daniel Lofton, do hereby certify that I have caused to be delivered a true copy of the foregoing document to all counsel of record via the Court's electronic case filing system (ECF) on this the 14<sup>th</sup> day of November, 2017.

Submitted,

\_\_\_\_/s/ Daniel Lofton\_\_\_\_\_  
Daniel Lofton